



United States Attorney
Southern District of New York

MEMO ENDORSED

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

August 31, 2020

BY ECF

The Honorable Kenneth M. Karas
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Karen Polonia Alcantara, et al.*, 19 Cr. 195 (KMK)


Dear Judge Karas:

The Government respectfully submits this letter, with the consent of counsel to each defendant, to request a 30 to 45-day adjournment of the upcoming status conference, previously scheduled for September 10, 2020. The parties are seeking the adjournment due to the restrictions on travel and contact in light of the COVID-19 pandemic. The parties have requested five prior adjournments, four of which were requested in light of the COVID-19 pandemic.

The parties have continued to discuss potential dispositions of the case without trial. Additionally, the Government has made electronically stored information and other discovery available to the defense, and to allow the defense time to review the discovery and determine what motions, if any, they wish to make, and in light of the COVID-19 pandemic and related restrictions on travel and contact, the Government requests that the time between the date of this letter and the next scheduled conference date be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interest of justice.

Granted. The next conference will be adjourned to 10/27/20 at 11:30 am. Time is excluded until then, to allow the Government to finish discovery production and to all Deendant to review the discovery and determine what, if any motions, should be filed. The interests of justice from this exclusion outweighs the public's and Defendant's interest in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.


9/1/20

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By: _____/s_____
Christopher D. Brumwell
Assistant United States Attorney
917-710-0661